

HEARING DATE AND TIME: December 12, 2013 at 10:00 a.m. (prevailing Eastern Time)

OBJECTION DEADLINE: November 20, 2013 at 5:00 p.m. (prevailing Eastern Time)

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Attorneys for Suntech Power Holdings Co., Ltd.

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

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In re:	: Chapter 7
	:
SUNTECH POWER HOLDINGS CO., LTD.,	: Case No. 13-13350 (SMB)
	:
Alleged Debtor.	:
	:
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**NOTICE OF MOTION OF SUNTECH POWER HOLDINGS CO., LTD.
TO DISMISS THE INVOLUNTARY CHAPTER 7 PETITION**

PLEASE TAKE NOTICE that Suntech Power Holdings Co., Ltd. will move before the Honorable Stuart M. Bernstein, at the United States Bankruptcy Court for the Southern District of New York, Courtroom 723, One Bowling Green, New York, New York 10004 (the “*Bankruptcy Court*”), on **December 12, 2013 at 10:00 a.m. (prevailing Eastern Time)** (the “*Motion*”), for an order dismissing with prejudice, the Involuntary Chapter 7 Petition filed by Petitioners Trondheim Capital Partners, L.P., Michael Meixler, Longball Holdings, LLC, and Jiangsu Liquidators, LLC, pursuant to Federal Rules of Civil Procedure 12(b)(3) and (6), made applicable to this proceeding by Federal Rule of Bankruptcy Procedure 1011(b). *See In re Suntech Power Holdings Co., Ltd.*, Case No. 13-13350 (SMB) (Bankr. S.D.N.Y. Oct. 14, 2013), ECF No. 1.

PLEASE TAKE FURTHER NOTICE that responses and objections, if any, to the Motion and the relief requested therein must (i) be made in writing, (ii) state with particularity the grounds therefore, (iii) conform to the Federal Rules of Bankruptcy Procedure and the Local Bankruptcy Rules for the Southern District of New York, and (iv) be filed with the Bankruptcy Court electronically in accordance with General Order M-399 (N.B.). General Order M-399 and the User’s Manual for the Electronic Case Filing System can be found at www.nysb.uscourts.gov, the official website for the United States Bankruptcy Court for the Southern District of New York, by registered users of the Court’s electronic case filing system and, by all other parties in interest, on a 3.5 inch disk or CD-ROM, preferably in Portable Document Format (PDF), WordPerfect or any other Windows-based word processing format (with a hard copy delivered directly to Chambers) and served in accordance with General Order M-399 or otherwise so as to be actually received no later than **5:00 pm. (prevailing Eastern time)** on **November 20, 2013** by O’Melveny & Myers LLP, attorneys for Suntech Power

Holdings Co., Ltd., Times Square Tower, 7 Times Square, New York, New York 10036 (Attn: Peter Friedman, Esq. and Diana Perez, Esq.) and Two Embarcadero Center, 28th Floor, San Francisco, California 94111 (Attn: Suzzanne Uhland, Esq.).

Dated: November 6, 2013
New York, New York

O'MELVENY & MYERS LLP

By: /s/ Diana Perez
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